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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 DEUTSCHE BANK NATIONAL TRUST
11 COMPANY, AS TRUSTEE FOR MORGAN
12 STANLEY ABS CAPITAL I INC. TRUST
13 2007-NC1 MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2007-NC1, a
California Company,

14 Plaintiff,

15 vs.

16 AIRMOTIVE INVESTMENTS, LLC, a Nevada
17 Limited Liability Company, HIGHLAND
18 RANCH HOMEOWNERS ASSOCIATION, a
Nevada non-profit corporation,

19 Defendants.
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21

Case No.: 3:15-cv-00401-LRH-WGC

**STIPULATION TO EXTEND
DEADLINE TO FILE RESPONSE TO
HIGHLAND RANCH HOMEOWNERS
ASSOCIATION'S MOTION FOR
PARTIAL DISMISSAL, OR IN THE
ALTERNATIVE, PARTIAL SUMMARY
JUDGMENT [ECF NO. 66]**

(Fifth Request)

AND ORDER THEREON

22 COMES NOW Plaintiff, Deutsche Bank National Trust Company, as Trustee for
23 Morgan Stanley ABS Capital I Inc. Trust 2007-NC1 Mortgage Pass-through Certificates, Series
24 2007-NC1 ("Deutsche Bank" or "Plaintiff"), and Defendant, Highland Ranch Homeowners
25 Association (hereinafter "HOA"), (collectively, the "Parties"), by and through their respective
26 undersigned counsel, and hereby stipulate and agree as follows:

27 Deutsche Bank filed its Second Amended Complaint on July 18, 2018 [ECF No. 59].
28 HOA filed its Motion for Partial Dismissal or, in the alternative, Partial Summary Judgment on

1 October 31, 2018 [ECF No. 66] (hereinafter "Motion"). Deutsche Bank currently has a deadline
2 of, March 4, 2019 to respond to HOA's Motion. However, the Parties are currently engaged in
3 discussions, which if successful would resolve the issues presented in the instant Motion.
4 Counsel for Deutsche Bank requests additional time to discuss the proposal with its client, whom
5 has been away at trial, prior to entering into the proposed resolution. While the Parties have
6 requested multiple extensions to this deadline, the Parties only recently began discussions which
7 would resolve the issues in the instant Motion. The request it is not intended to delay the Court
8 and is made in an effort to avoid unnecessary litigation expenses and to conserve judicial
9 resources. As such, the Parties stipulate and agree to a brief extension for Deutsche Bank to file
10 its response from March 4, 2019 to March 18, 2019.

11 This is the Parties' fifth request for an extension of this deadline and is not made to cause
12 delay or prejudice to any party.

13 **IT IS HEREBY STIPULATED** that Deutsche Bank has up to and including March 18,
14 2019, to file its response to the HOA's Motion.

15 DATED this 4th day of March, 2019.

DATED this 4th day of March, 2019.

16 WRIGHT, FINLAY & ZAK, LLP

LAXALT & NOMURA, LTD.

17
18 /s/ Lindsay D. Robbins, Esq.

/s/ Ryan Leary, Esq.

Lindsay D. Robbins, Esq.

Ryan Leary, Esq.

19 Nevada Bar No. 13474

Nevada Bar No. 11630

20 *Attorneys for Deutsche Bank National Trust*
21 *Company, as trustee for Morgan Stanley*

Attorney for Highland Ranch Homeowners
Association

22 *ABS Capital I Inc. Trust 2007-NC1*

Mortgage Pass-through Certificates, Series
2007-NC

23 **ORDER**

24 IT IS SO ORDERED, *nunc pro tunc*.

25 DATED this 7th day of March, 2019.

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28 LARRY R. HICKS
UNITED STATES DISTRICT JUDGE